

1 James Patrick Shea, Esq.  
Nevada Bar No. 405  
2 Bart K. Larsen, Esq.  
Nevada Bar No. 8538  
3 Kyle M. Wyant, Esq.  
Nevada Bar No. 14652  
4 **SHEA LARSEN**  
1731 Village Center Circle, Suite 150  
5 Las Vegas, Nevada 89134  
Telephone: (702) 471-7432  
6 Fax: (702) 926-9683  
Email: jshea@shea.law  
7 blarsen@shea.law  
kwyant@shea.law

8  
*Attorneys for HASelect-Medical Receivables*  
9 *Litigation Finance Fund International SP*

10 **UNITED STATES BANKRUPTCY COURT**

11 **DISTRICT OF NEVADA**

12 In re:

13 INFINITY CAPITAL MANAGEMENT,  
14 INC.

15 Debtor.

Case No. 21-14486-abl  
Chapter 7

16 **AMENDED NOTICE OF ISSUANCE OF SUBPOENA FOR RULE 2004**  
**EXAMINATION OF KEVIN GRIMES**

18 TO ALL INTERESTED PARTIES AND THEIR RESPECTIVE COUNSEL:

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

**SHEA LARSEN**  
1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134  
(702) 471-7432

1 PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 45(a)(4) and Fed. R. Bankr. P.  
2 2004, HASelect-Medical Receivables Litigation Finance Fund International SP (“HASelect”), by  
3 and through its undersigned counsel, intends to serve the *Subpoena for Rule 2004 Examination*  
4 attached hereto as Exhibit 1 on KEVIN GRIMES.

5 DATED this 30th day of March, 2022.  
6

7 **SHEA LARSEN**  
8

9 */s/ Bart K. Larsen, Esq.*  
10 James Patrick Shea, Esq.  
11 Nevada Bar No. 405  
12 Bart K. Larsen, Esq.  
13 Nevada Bar No. 8538  
14 Kyle M. Wyant, Esq.  
15 Nevada Bar No. 14652  
16 1731 Village Center Circle, Suite 150  
17 Las Vegas, Nevada 89134  
18

19 *Attorneys for HASelect-Medical Receivables*  
20 *Litigation Finance Fund International SP*  
21  
22  
23  
24  
25  
26  
27  
28

**SHEA LARSEN**  
1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134  
(702) 471-7432

**CERTIFICATE OF SERVICE**

1. On March 30, 2022, I served the following document(s): **AMENDED NOTICE OF ISSUANCE OF SUBPOENA FOR RULE 2004 EXAMINATION OF KEVIN GRIMES**
  2. I served the above document(s) by the following means to the persons as listed below:

a. ECF System:

ROBERT E. ATKINSON

[Robert@ch7.vegas](mailto:Robert@ch7.vegas), [TrusteeECF@ch7.vegas](mailto:TrusteeECF@ch7.vegas); [ecf.alert+atkinson@titlexi.com](mailto:ecf.alert+atkinson@titlexi.com)

CLARISSE L. CRISOSTOMO on behalf of Trustee ROBERT E. ATKINSON  
[clarisse@nv-lawfirm.com](mailto:clarisse@nv-lawfirm.com), [bknotices@nv-lawfirm.com](mailto:bknotices@nv-lawfirm.com)

BRADFORD IRELAN on behalf of Creditor HEALTHPLUS IMAGINING OF TEXAS,  
LLC

[birelan@imtexaslaw.com](mailto:birelan@imtexaslaw.com),  
[jstephens@imtexaslaw.com](mailto:jstephens@imtexaslaw.com); [dhall@imtexaslaw.com](mailto:dhall@imtexaslaw.com); [ynguyen@imtexaslaw.com](mailto:ynguyen@imtexaslaw.com)

DAVID MINCIN on behalf of Creditor HEALTHPLUS IMAGINING OF TEXAS, LLC  
[dmincin@mincinlaw.com](mailto:dmincin@mincinlaw.com), [cburke@mincinlaw.com](mailto:cburke@mincinlaw.com)

MICHAEL D. NAPOLI on behalf of Creditor TECUMSEH - INFINITY MEDICAL RECEIVABLES FUND, LP  
[michael.napoli@akerman.com](mailto:michael.napoli@akerman.com),  
[cindy.ferguson@akerman.com](mailto:cindy.ferguson@akerman.com); [catherine.kretzschmar@akerman.com](mailto:catherine.kretzschmar@akerman.com); [masterdocketlit@akerman.com](mailto:masterdocketlit@akerman.com)

TRENT L. RICHARDS on behalf of Creditor THE INJURY SPECIALISTS  
[trichards@sagebrushlawyers.com](mailto:trichards@sagebrushlawyers.com)

ARIEL E. STERN on behalf of Creditor TECUMSEH - INFINITY MEDICAL RECEIVABLES FUND, LP

[USTRUSTEE@AMERICAN.COM](mailto:USTRUSTEE@AMERICAN.COM), [ADMIRALITIES@AMERICAN.COM](mailto:ADMIRALITIES@AMERICAN.COM)

USTPRegion17.LV.ECF@usdoj.gov

MATTHEW C. ZIRZOW

Matthew S. Zarew on behalf of  
INC

MATTHEW C. ZIRZOW on behalf of  
INC

MATTHEW C. ZIRZOW

**MATTHEW C. ZEKE  
INC.**

[mzirzow@lzlawnv.com](mailto:mzirzow@lzlawnv.com),  
[carey@lzlawnv.com](mailto:carey@lzlawnv.com); [trish@lzlawnv.com](mailto:trish@lzlawnv.com); [jennifer@lzlawnv.com](mailto:jennifer@lzlawnv.com); [zirzow.matthewc.r99681@notify.bestcase.com](mailto:zirzow.matthewc.r99681@notify.bestcase.com)

b. United States mail, postage fully prepaid:

1  
2            c.     Personal Service:

3 I personally delivered the document(s) to the persons at these addresses:

4            For a party represented by an attorney, delivery was made by  
5 handing the document(s) at the attorney's office with a clerk or other person in  
6 charge, or if no one is in charge by leaving the document(s) in a conspicuous place  
in the office.

7            For a party, delivery was made by handling the document(s)  
8 to the party or by leaving the document(s) at the person's dwelling house or usual  
place of abode with someone of suitable age and discretion residing there.

9            d.     By direct email (as opposed to through the ECF System):  
10 Based upon the written agreement of the parties to accept service by email or a  
court order, I caused the document(s) to be sent to the persons at the email  
addresses listed below. I did not receive, within a reasonable time after the  
transmission, any electronic message or other indication that the transmission was  
unsuccessful.

11            e.     By fax transmission:

12 Based upon the written agreement of the parties to accept service by fax  
transmission or a court order, I faxed the document(s) to the persons at the fax  
numbers listed below. No error was reported by the fax machine that I used. A copy  
of the record of the fax transmission is attached.

13            f.     By messenger:

14 I served the document(s) by placing them in an envelope or package addressed to  
the persons at the addresses listed below and providing them to a messenger for  
service.

15 I declare under penalty of perjury that the foregoing is true and correct.

16 Dated: March 30, 2022.

17 By: /s/ Bart K. Larsen, Esq.

SHEA LARSEN  
1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134  
(702) 471-7432

# EXHIBIT 1

# UNITED STATES BANKRUPTCY COURT

District of Nevada

In re:

INFINITY CAPITAL MANAGEMENT, INC.

Debtor.

Case No. 21-14486-abl  
Chapter 7

## SUBPOENA FOR RULE 2004 EXAMINATION

To: KEVIN GRIMES  
4045 Great Plains Way, Las Vegas, Nevada 89121

*Testimony*: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at an examination under Rule 2004, Federal Rules of Bankruptcy Procedure. A list of subjects on which you will be examined is attached hereto as Exhibit A. A copy of the court order authorizing the examination is attached hereto as Exhibit B.

LOCATION:

**The 2004 examination shall take place remotely via videoconference.  
Instructions for attending the 2004 examination will be provided prior to  
the examination date.**

DATE AND TIME: **April 29, 2022 at  
9:00 a.m.**

The examination will be recorded by this method: stenographic and/or videotape.

*Production*: You, or your representatives, must also bring with you to the examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: A list of items to be produced is attached hereto as Exhibit A.

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: March 30, 2022

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ Bart K. Larsen, Esq.

Attorney's signature

The name, address, email address, and telephone number of the attorney representing HASelect-Medical Receivables Litigation Finance Fund International SP, who issues or requests this subpoena, are: Bart K. Larsen, Esq., SHEA LARSEN PC, 1731 Village Center Circle, Suite 150, Las Vegas, Nevada 89134, (702) 471-7432, [blarsen@shea.law](mailto:blarsen@shea.law).

### **Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

**PROOF OF SERVICE****(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)**

I received this subpoena for (*name of individual and title, if any*): \_\_\_\_\_  
on (*date*) \_\_\_\_\_.

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ on (*date*) \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true and correct.

Date: \_\_\_\_\_

*Server's signature*

*Printed name and title*

*Server's address*

Additional information concerning attempted service, etc.:

**Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)**  
**(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)**

**(c) Place of compliance.**

- (1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
  - (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
    - (i) is a party or a party's officer; or
    - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises, at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...

(g) *Contempt.* The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

# EXHIBIT A

**EXHIBIT A**

**DEFINITIONS AND INSTRUCTIONS**

1.     **“Bankruptcy Case”** shall mean the following case: *In re Infinity Capital Management, Inc.*, United States Bankruptcy Court for the District of Nevada, Case No. 21-14486-abl.

2.     **“Communication”** means any oral or written statement, dialogue, colloquy, discussion, or conversation, and includes any transfer of thoughts or ideas or data or information, between persons or locations by means of any Documents or by any other means, including but not limited to electronic or similar means.

3.     **“Control”** means in your possession, custody, or control or under your direction, and includes in the possession, custody, or control of those under the direction of you or your employees, subordinates, counsel, accountant, consultant, expert, parent or affiliated corporation, and any person purporting to act on your behalf.

4.     **“Document”** means any written or graphic matter and other means of preserving thought or expression and all tangible things from which information can be processed or transcribed, including the originals and all non-identical copies, whether different from the original by reason of any notation made on such copy or otherwise, including, but not limited to, correspondence, emails, memoranda, notes, messages, letters, telegrams, teletype, telefax, bulletins, meetings or other communications, inter-office and intra-office telephone calls, diaries, chronological data, minutes, books, reports, studies, summaries, pamphlets, bulletins, printed matter, charts, ledgers, invoices, worksheets, receipts, returns, computer printouts, prospectuses, financial statements, schedules, affidavits, contracts, canceled checks, statements, transcripts, statistics, surveys, magazine or newspaper articles, releases (and any and all drafts, alterations or modifications, changes and amendments of any of the foregoing), graphic or aural records or representations of any kind (including without limitation, photographs, microfiche, microfilm, videotape, records and motion pictures) and electronic, mechanical or electric records or representations of any kind (including without limitation, tapes, cassettes, discs and records) as

well as all Electronically Stored Information (“ESI”), which refers to any type of information that is created, used, or stored in digital form and accessible by digital means, including but not limited to, all data, digital documents, email, electronic documents, and metadata of the same (and is further defined below). For the avoidance of doubt, Document includes but is not limited to all Communications.

5. “**HASelect**” shall refer to Creditor HASelect-Medical Receivables Litigation Finance Fund International SP, including its employees, directors, officers, agents, servants, subsidiaries, parent company, affiliated company, and other persons acting or purporting to act on its behalf, including its Representatives.

6. “**Hemmers**” shall refer to Oliver Hemmers, one of Infinity’s owners and/or principals, and where appropriate, all persons acting or purporting to act on his behalf, including Representatives.

7. “**Infinity**” or “**Debtor**” shall refer to Debtor Infinity Capital Management, Inc., including its employees, directors, officers, agents, servants, subsidiaries, parent company, affiliated company, and other persons acting or purporting to act on its behalf, including its Representatives.

8. “**Pantelas**” shall refer to Anne Pantelas, one of Infinity’s owners and/or principals, and where appropriate, all persons acting or purporting to act on her behalf, including Representatives.

9. “**Person**” refers to any natural individual, governmental entity, or business entity, including a corporation, partnership, association, limited liability company, or other entity or combination thereof, and all corporations, divisions, or entities affiliated with, owned, or controlled directly or indirectly or owning or controlling directly or indirectly any such entities as well as directors, officers, managers, employees, agents, attorneys, affiliates, or other representatives thereof, or third parties retained by any of the above.

10. “**Petition Date**” refers to September 14, 2021.

11. The terms “**related to**”, “**relate to**”, or “**relating to**” shall mean directly or

indirectly, refer to, reflect, describe, pertain to, arise out of or in connection with, or in any way legally, logically, or factually be connected with the matter discussed.

12. “**Representative**” means any and all agents, employees, servants, officers, directors, attorneys, or other persons acting or purporting to act on behalf of the person in question.

13. “**You**” shall refer to Kevin Grimes, and where appropriate, his employees, directors, officers, members, agents, servants, and other persons acting or purporting to act on its behalf, including its Representatives.

14. The words “and” and “or” as used herein shall be construed either disjunctively or conjunctively as required by the context to bring within the scope of these Requested Documents any answer that might be deemed outside their scope by another construction.

15. When producing the Documents, please keep all Documents segregated by the file in which the Documents are contained and indicate the name of the file in which the Documents are contained, and the name of the Documents being produced.

16. When producing the required Documents, please produce all other Documents that are clipped, stapled, or otherwise attached to any requested Document.

17. In the event such file(s) or Document(s) has (have) been removed, either for the purpose of this action or for some other purpose, please state the name and address of the person who removed the file, the title of the file and each subfile, if any, maintained within the file, and the present location of the file.

18. Each draft, final Document, original, reproduction, and each signed and unsigned Document and every additional copy of such Document where such copy contains any commentary, note, notation or other change whatsoever that does not appear on the original or on the copy of the one Document produced shall be deemed and considered to constitute a separate Document.

19. If any of the Documents encompassed by the attached request for production of Documents is/are deemed by you to be privileged, furnish all non-privileged Documents and provide a log outlining all Documents claimed as privileged which includes: (a) the type of

privilege claimed for each Document; (b) a brief description of the Document; (c) the author of the Document sufficient to identify it; (d) the recipient (if any); (e) the date of the Document.

20. When appropriate, the singular form of a word should be interpreted in the plural as may be necessary to bring within the scope hereof any Documents which might otherwise be construed to be outside the scope hereof.

21. In addition to Documents currently in your possession, custody or control, you are to produce all Documents within the scope of these requests that are not currently in your possession, custody, or control but can be obtained through reasonable effort.

22. This request calls for the production of all electronic Documents and electronically stored information (ESI) responsive to the requests below, including but not limited to e-mails and any related attachments, electronic files, or other data compilations that relate to the categories of Documents requested below. Your search for these electronically stored Documents shall include all of your computer hard drives, floppy discs, compact discs, backup and archival tapes, removable media such as zip drives, password protected and encrypted files, databases, electronic calendars, personal digital assistants, iPhones, smart phones, tablets, iPads, proprietary software, and inactive or unused computer disc storage areas.

#### **DOCUMENT PRODUCTION REQUESTS**

1. All Communications, including, but not limited to, emails, text messages, Slack communications, WhatsApp communications, and any written documents, between You and any Person regarding the electronic or computer systems used by Debtor to store or transmit Documents from January 1, 2020 through present.

2. All Communications, including, but not limited to, emails, text messages, Slack communications, WhatsApp communications, and any written documents, between You and any Person regarding the Bankruptcy Case or related adversary proceedings from January 1, 2020 through present.

3. All Communications, including, but not limited to, emails, text messages, Slack communications, WhatsApp communications, and any written documents, between You and

Hemmers regarding Debtor's electronically stored information, and any alteration, maintenance, or deletion of the same from January 1, 2020 through present.

4. All Communications, including, but not limited to, emails, text messages, Slack communications, WhatsApp communications, and any written documents, between You and Pantelas regarding Debtor's electronically stored information, and any alteration, maintenance, or deletion of the same from January 1, 2020 through present.

5. All Communications, including, but not limited to, emails, text messages, Slack communications, WhatsApp communications, and any written documents, between you and any Person relating to the copying or transfer of Debtor's electronically stored information for use by Infinity Health Solutions, LLC from January 1, 2020 through present.

6. All Communications, including, but not limited to, emails, text messages, Slack communications, WhatsApp communications, and any written documents, between you and any Person relating to work performed by you for Infinity Health Solutions, LLC from January 1, 2020 through present.

# EXHIBIT B

1 James Patrick Shea, Esq.  
Nevada Bar No. 405  
2 Bart K. Larsen, Esq.  
Nevada Bar No. 8538  
3 Kyle M. Wyant, Esq.  
Nevada Bar No. 14652  
4 **SHEA LARSEN**  
1731 Village Center Circle, Suite 150  
5 Las Vegas, Nevada 89134  
Telephone: (702) 471-7432  
6 Fax: (702) 926-9683  
Email: jshea@shea.law  
7 blarsen@shea.law  
kwyant@shea.law  
8

9 *Attorneys for HASelect-Medical Receivables  
Litigation Finance Fund International SP*

10 **UNITED STATES BANKRUPTCY COURT**

11 **DISTRICT OF NEVADA**

12 In re:

13 INFINITY CAPITAL MANAGEMENT,  
14 INC.

15 Debtor.

16 Case No. 21-14486-abl  
17 Chapter 7

18 **NOTICE OF ENTRY OF ORDER GRANTING EX PARTE MOTION FOR AN  
19 ORDER DIRECTING EXAMINATION PURSUANT TO FED. R. BANKR. P. 2004  
20 OF KEVIN GRIMES**

21 **PLEASE TAKE NOTICE** that on January 10, 2022, the Court entered an *Order Granting  
Ex Parte Motion for an Order Directing Examination Pursuant to Fed. R. Bankr. P. 2004 of Kevin  
Grimes* [ECF No. 171]. A copy of said Order is attached hereto as **Exhibit 1**.

22 DATED this 11th day of January, 2022.

23 **SHEA LARSEN**

24 /s/ Bart K. Larsen, Esq.

25 Bart K. Larsen, Esq.  
Nevada Bar No. 8538  
Kyle M. Wyant, Esq.  
Nevada Bar No. 14652  
1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134

26  
27 *Attorneys for HASelect-Medical Receivables  
Litigation Finance Fund International SP*

28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100  
101  
102  
103  
104  
105  
106  
107  
108  
109  
110  
111  
112  
113  
114  
115  
116  
117  
118  
119  
120  
121  
122  
123  
124  
125  
126  
127  
128  
129  
130  
131  
132  
133  
134  
135  
136  
137  
138  
139  
140  
141  
142  
143  
144  
145  
146  
147  
148  
149  
150  
151  
152  
153  
154  
155  
156  
157  
158  
159  
160  
161  
162  
163  
164  
165  
166  
167  
168  
169  
170  
171  
172  
173  
174  
175  
176  
177  
178  
179  
180  
181  
182  
183  
184  
185  
186  
187  
188  
189  
190  
191  
192  
193  
194  
195  
196  
197  
198  
199  
200  
201  
202  
203  
204  
205  
206  
207  
208  
209  
210  
211  
212  
213  
214  
215  
216  
217  
218  
219  
220  
221  
222  
223  
224  
225  
226  
227  
228  
229  
230  
231  
232  
233  
234  
235  
236  
237  
238  
239  
240  
241  
242  
243  
244  
245  
246  
247  
248  
249  
250  
251  
252  
253  
254  
255  
256  
257  
258  
259  
260  
261  
262  
263  
264  
265  
266  
267  
268  
269  
270  
271  
272  
273  
274  
275  
276  
277  
278  
279  
280  
281  
282  
283  
284  
285  
286  
287  
288  
289  
290  
291  
292  
293  
294  
295  
296  
297  
298  
299  
300  
301  
302  
303  
304  
305  
306  
307  
308  
309  
310  
311  
312  
313  
314  
315  
316  
317  
318  
319  
320  
321  
322  
323  
324  
325  
326  
327  
328  
329  
330  
331  
332  
333  
334  
335  
336  
337  
338  
339  
340  
341  
342  
343  
344  
345  
346  
347  
348  
349  
350  
351  
352  
353  
354  
355  
356  
357  
358  
359  
360  
361  
362  
363  
364  
365  
366  
367  
368  
369  
370  
371  
372  
373  
374  
375  
376  
377  
378  
379  
380  
381  
382  
383  
384  
385  
386  
387  
388  
389  
390  
391  
392  
393  
394  
395  
396  
397  
398  
399  
400  
401  
402  
403  
404  
405  
406  
407  
408  
409  
410  
411  
412  
413  
414  
415  
416  
417  
418  
419  
420  
421  
422  
423  
424  
425  
426  
427  
428  
429  
430  
431  
432  
433  
434  
435  
436  
437  
438  
439  
440  
441  
442  
443  
444  
445  
446  
447  
448  
449  
450  
451  
452  
453  
454  
455  
456  
457  
458  
459  
460  
461  
462  
463  
464  
465  
466  
467  
468  
469  
470  
471  
472  
473  
474  
475  
476  
477  
478  
479  
480  
481  
482  
483  
484  
485  
486  
487  
488  
489  
490  
491  
492  
493  
494  
495  
496  
497  
498  
499  
500  
501  
502  
503  
504  
505  
506  
507  
508  
509  
510  
511  
512  
513  
514  
515  
516  
517  
518  
519  
520  
521  
522  
523  
524  
525  
526  
527  
528  
529  
530  
531  
532  
533  
534  
535  
536  
537  
538  
539  
540  
541  
542  
543  
544  
545  
546  
547  
548  
549  
550  
551  
552  
553  
554  
555  
556  
557  
558  
559  
560  
561  
562  
563  
564  
565  
566  
567  
568  
569  
570  
571  
572  
573  
574  
575  
576  
577  
578  
579  
580  
581  
582  
583  
584  
585  
586  
587  
588  
589  
590  
591  
592  
593  
594  
595  
596  
597  
598  
599  
600  
601  
602  
603  
604  
605  
606  
607  
608  
609  
610  
611  
612  
613  
614  
615  
616  
617  
618  
619  
620  
621  
622  
623  
624  
625  
626  
627  
628  
629  
630  
631  
632  
633  
634  
635  
636  
637  
638  
639  
640  
641  
642  
643  
644  
645  
646  
647  
648  
649  
650  
651  
652  
653  
654  
655  
656  
657  
658  
659  
660  
661  
662  
663  
664  
665  
666  
667  
668  
669  
670  
671  
672  
673  
674  
675  
676  
677  
678  
679  
680  
681  
682  
683  
684  
685  
686  
687  
688  
689  
690  
691  
692  
693  
694  
695  
696  
697  
698  
699  
700  
701  
702  
703  
704  
705  
706  
707  
708  
709  
710  
711  
712  
713  
714  
715  
716  
717  
718  
719  
720  
721  
722  
723  
724  
725  
726  
727  
728  
729  
730  
731  
732  
733  
734  
735  
736  
737  
738  
739  
740  
741  
742  
743  
744  
745  
746  
747  
748  
749  
750  
751  
752  
753  
754  
755  
756  
757  
758  
759  
760  
761  
762  
763  
764  
765  
766  
767  
768  
769  
770  
771  
772  
773  
774  
775  
776  
777  
778  
779  
780  
781  
782  
783  
784  
785  
786  
787  
788  
789  
790  
791  
792  
793  
794  
795  
796  
797  
798  
799  
800  
801  
802  
803  
804  
805  
806  
807  
808  
809  
8010  
8011  
8012  
8013  
8014  
8015  
8016  
8017  
8018  
8019  
8020  
8021  
8022  
8023  
8024  
8025  
8026  
8027  
8028  
8029  
8030  
8031  
8032  
8033  
8034  
8035  
8036  
8037  
8038  
8039  
8040  
8041  
8042  
8043  
8044  
8045  
8046  
8047  
8048  
8049  
8050  
8051  
8052  
8053  
8054  
8055  
8056  
8057  
8058  
8059  
8060  
8061  
8062  
8063  
8064  
8065  
8066  
8067  
8068  
8069  
8070  
8071  
8072  
8073  
8074  
8075  
8076  
8077  
8078  
8079  
8080  
8081  
8082  
8083  
8084  
8085  
8086  
8087  
8088  
8089  
8090  
8091  
8092  
8093  
8094  
8095  
8096  
8097  
8098  
8099  
80100  
80101  
80102  
80103  
80104  
80105  
80106  
80107  
80108  
80109  
80110  
80111  
80112  
80113  
80114  
80115  
80116  
80117  
80118  
80119  
80120  
80121  
80122  
80123  
80124  
80125  
80126  
80127  
80128  
80129  
80130  
80131  
80132  
80133  
80134  
80135  
80136  
80137  
80138  
80139  
80140  
80141  
80142  
80143  
80144  
80145  
80146  
80147  
80148  
80149  
80150  
80151  
80152  
80153  
80154  
80155  
80156  
80157  
80158  
80159  
80160  
80161  
80162  
80163  
80164  
80165  
80166  
80167  
80168  
80169  
80170  
80171  
80172  
80173  
80174  
80175  
80176  
80177  
80178  
80179  
80180  
80181  
80182  
80183  
80184  
80185  
80186  
80187  
80188  
80189  
80190  
80191  
80192  
80193  
80194  
80195  
80196  
80197  
80198  
80199  
80200  
80201  
80202  
80203  
80204  
80205  
80206  
80207  
80208  
80209  
80210  
80211  
80212  
80213  
80214  
80215  
80216  
80217  
80218  
80219  
80220  
80221  
80222  
80223  
80224  
80225  
80226  
80227  
80228  
80229  
80230  
80231  
80232  
80233  
80234  
80235  
80236  
80237  
80238  
80239  
80240  
80241  
80242  
80243  
80244  
80245  
80246  
80247  
80248  
80249  
80250  
80251  
80252  
80253  
80254  
80255  
80256  
80257  
80258  
80259  
80260  
80261  
80262  
80263  
80264  
80265  
80266  
80267  
80268  
80269  
80270  
80271  
80272  
80273  
80274  
80275  
80276  
80277  
80278  
80279  
80280  
80281  
80282  
80283  
80284  
80285  
80286  
80287  
80288  
80289  
80290  
80291  
80292  
80293  
80294  
80295  
80296  
80297  
80298  
80299  
80200  
80201  
80202  
80203  
80204  
80205  
80206  
80207  
80208  
80209  
80210  
80211  
80212  
80213  
80214  
80215  
80216  
80217  
80218  
80219  
80220  
80221  
80222  
80223  
80224  
80225  
80226  
80227  
80228  
80229  
80230  
80231  
80232  
80233  
80234  
80235  
80236  
80237  
80238  
80239  
80240  
80241  
80242  
80243  
80244  
80245  
80246  
80247  
80248  
80249  
80250  
80251  
80252  
80253  
80254  
80255  
80256  
80257  
80258  
80259  
80260  
80261  
80262  
80263  
80264  
80265  
80266  
80267  
80268  
80269  
80270  
80271  
80272  
80273  
80274  
80275  
80276  
80277  
80278  
80279  
80280  
80281  
80282  
80283  
80284  
80285  
80286  
80287  
80288  
80289  
80290  
80291  
80292  
80293  
80294  
80295  
80296  
80297  
80298  
80299  
80200  
80201  
80202  
80203  
80204  
80205  
80206  
80207  
80208  
80209  
80210  
80211  
80212  
80213  
80214  
80215  
80216  
80217  
80218  
80219  
80220  
80221  
80222  
80223  
80224  
80225  
80226  
80227  
80228  
80229  
80230  
80231  
80232  
80233  
80234  
80235  
80236  
80237  
80238  
80239  
80240  
80241  
80242  
80243  
80244  
80245  
80246  
80247  
80248  
80249  
80250  
80251  
80252  
80253  
80254  
80255  
80256  
80257  
80258  
80259  
80260  
80261  
80262  
80263  
80264  
80265  
80266  
80267  
80268  
80269  
80270  
80271  
80272  
80273  
80274  
80275  
80276  
80277  
80278  
80279  
80280  
80281  
80282  
80283  
80284  
80285  
80286  
80287  
80288  
80289  
80290  
80291  
80292  
80293  
80294  
80295  
80296  
80297  
80298  
80299  
80200  
80201  
80202  
80203  
80204  
80205  
80206  
80207  
80208  
80209  
80210  
80211  
80212  
80213  
80214  
80215  
80216  
80217  
80218  
80219  
80220  
80221  
80222  
80223  
80224  
80225  
80226  
80227  
80228  
80229  
80230  
80231  
80232  
80233  
80234  
80235  
80236  
80237  
80238  
80239  
80240  
80241  
80242  
80243  
80244  
80245  
80246  
80247  
80248  
80249  
80250  
80251  
80252  
80253  
80254  
80255  
80256  
80257  
80258  
80259  
80260  
80261  
80262  
80263  
80264  
80265  
80266  
80267  
80268  
80269  
80270  
80271  
80272  
80273  
80274  
80275  
80276  
80277  
80278  
80279  
80280  
80281  
80282  
80283  
80284  
80285  
80286  
80287  
80288  
80289  
80290  
80291  
80292  
80293  
80294  
80295  
80296  
80297  
80298  
80299  
80200  
80201  
80202  
80203  
80204  
80205  
80206  
80207  
80208  
80209  
80210  
80211  
80212  
80213  
80214  
80215  
80216  
80217  
80218  
80219  
80220  
80221  
80222  
80223  
80224  
80225  
80226  
80227  
80228  
80229  
80230  
80231  
80232  
80233  
80234  
80235  
80236  
80237  
80238  
80239  
80240  
80241  
80242  
80243  
80244  
80245  
80246  
80247  
80248  
80249  
80250  
80251  
80252  
80253  
80254  
80255  
80256  
80257  
80258  
80259  
80260  
80261  
80262  
80263  
80264  
80265  
80266  
80267  
80268  
80269  
80270  
80271  
80272  
80273  
80274  
80275  
80276  
80277  
80278  
80279  
80280  
80281  
80282  
80283  
80284  
80285  
80286  
80287  
80288  
80289  
80290  
80291  
80292  
80293  
80294  
80295  
80296  
80297  
80298  
80299  
80200  
80201  
80202  
80203  
80204  
80205  
80206  
80207  
80208  
80209  
80210  
80211  
80212  
80213  
80214  
80215  
80216  
80217  
80218  
80219  
80220  
80221  
80222  
80223  
80224  
80225  
80226  
80227  
80228  
80229  
80230  
80231  
80232  
80233  
80234  
80235  
80236  
80237  
80238  
80239  
80240  
80241  
80242  
80243  
80244  
80245  
80246  
80247  
80248  
80249  
80250  
80251  
80252  
80253  
80254  
80255  
80256  
80257  
80258  
80259  
80260  
80261  
80262  
80263  
80264  
80265  
80266  
80267  
80268  
80269  
80270  
80271  
80272  
80273  
80274  
80275  
80276  
80277  
80278  
80279  
80280  
80281  
80282  
80283  
80284  
80285  
80286  
80287  
80288  
80289  
80290  
80291  
80292  
80293  
80294  
80295  
80296  
80297  
80298  
80299  
80200  
80201  
80202  
80203  
80204  
80205  
80206  
80207  
80208  
80209  
80210  
80211  
80212  
80213  
80214  
80215  
80216  
80217  
80218  
80219  
80220  
80221  
80222  
80223  
80224  
80225  
80226  
80227  
80228  
80229  
80230  
80231  
80232  
80233  
80234  
80235  
80236  
80237  
80238  
80239  
80240  
80241  
80242  
80243  
80244  
80245  
80246  
80247  
80248  
80249  
80250  
80251  
80252  
80253  
80254  
80255  
80256  
80257  
80258  
80259  
80260  
80261  
80262  
80263  
80264  
80265  
80266  
80267  
80268  
80269  
80270  
80271  
80272  
80273  
80274  
80275  
80276  
80277  
80278  
80279  
80280  
80281  
80282  
80283  
80284  
80285  
80286  
80287  
80288  
80289  
80290  
80291  
80292  
80293  
80294  
80295  
80296  
80297  
80298  
80299  
80200  
80201  
80202  
80203  
80204  
80205  
80206  
80207  
80208  
80209  
80210  
80211  
80212  
80213  
80214  
80215  
80216  
80217  
80218  
80219  
80220  
80221  
80222  
80223  
80224  
80225  
80226  
80227  
80228  
80

**CERTIFICATE OF SERVICE**

1. On January 11, 2022, I served the following document(s): **NOTICE OF ENTRY OF ORDER GRANTING EX PARTE MOTION FOR AN ORDER DIRECTING EXAMINATION PURSUANT TO FED. R. BANKR. P. 2004 OF KEVIN GRIMES**
  2. I served the above document(s) by the following means to the persons as listed below:

a. ECF System:

ROBERT E. ATKINSON

[Robert@ch7.vegas](mailto:Robert@ch7.vegas), [TrusteeECF@ch7.vegas](mailto:TrusteeECF@ch7.vegas); [ecf.alert+atkinson@titlexi.com](mailto:ecf.alert+atkinson@titlexi.com)

CLARISSE L. CRISOSTOMO on behalf of Trustee ROBERT E. ATKINSON  
[clarisse@nv-lawfirm.com](mailto:clarisse@nv-lawfirm.com), [bknotices@nv-lawfirm.com](mailto:bknotices@nv-lawfirm.com)

BRADFORD IRELAN on behalf of Creditor HEALTHPLUS IMAGINING OF TEXAS,  
LLC

[birelan@imtexaslaw.com](mailto:birelan@imtexaslaw.com),  
[jstephens@imtexaslaw.com](mailto:jstephens@imtexaslaw.com); [dhall@imtexaslaw.com](mailto:dhall@imtexaslaw.com); [ynguyen@imtexaslaw.com](mailto:ynguyen@imtexaslaw.com)

DAVID MINCIN on behalf of Creditor HEALTHPLUS IMAGINING OF TEXAS, LLC  
[dmincin@mincinlaw.com](mailto:dmincin@mincinlaw.com), [cburke@mincinlaw.com](mailto:cburke@mincinlaw.com)

MICHAEL D. NAPOLI on behalf of Creditor TECUMSEH - INFINITY MEDICAL RECEIVABLES FUND, LP

[cindy.ferguson@akerman.com](mailto:cindy.ferguson@akerman.com); [catherine.kretzschmar@akerman.com](mailto:catherine.kretzschmar@akerman.com); [masterdocketlit@akerman.com](mailto:masterdocketlit@akerman.com)

[View Details](#) | [Edit](#) | [Delete](#)

TRENT L. RICHARDS on behalf of Creditor THE INJURY SPECIALISTS  
[trichards@sagebrushlawyers.com](mailto:trichards@sagebrushlawyers.com)

ARIEL E. STERN on behalf of Creditor TECUMSEH - INFINITY MEDICAL RECEIVABLES FUND, LP

[ariel.stern@akerman.com](mailto:ariel.stern@akerman.com), [akermanlas@akerman.com](mailto:akermanlas@akerman.com)

**U.S. TRUSTEE - LV - 7**

USTPRegion17.LV.ECF@usdoj.gov

MATTHEW C. ZIRZOW on behalf of Debtor INFINITY CAPITAL MANAGEMENT, INC.

mzirzow@lzlawnv.com,

[carey@lzlawnv.com](mailto:carey@lzlawnv.com); [trish@lzlawnv.com](mailto:trish@lzlawnv.com); [jennifer@lzlawnv.com](mailto:jennifer@lzlawnv.com); [zirzow.matthewc.r99681@notify.bestcase.com](mailto:zirzow.matthewc.r99681@notify.bestcase.com)

1                  b.       United States mail, postage fully prepaid:

2                  c.       Personal Service:

3           I personally delivered the document(s) to the persons at these addresses:

4

5                  For a party represented by an attorney, delivery was made by  
6           handing the document(s) at the attorney's office with a clerk or other person in  
7           charge, or if no one is in charge by leaving the document(s) in a conspicuous place  
in the office.

8

9                  For a party, delivery was made by handing the document(s)  
to the party or by leaving the document(s) at the person's dwelling house or usual  
place of abode with someone of suitable age and discretion residing there.

10

11                  d.       By direct email (as opposed to through the ECF System):  
12           Based upon the written agreement of the parties to accept service by email or a  
court order, I caused the document(s) to be sent to the persons at the email  
addresses listed below. I did not receive, within a reasonable time after the  
transmission, any electronic message or other indication that the transmission was  
unsuccessful.

13

14                  e.       By fax transmission:

15

16           Based upon the written agreement of the parties to accept service by fax  
transmission or a court order, I faxed the document(s) to the persons at the fax  
numbers listed below. No error was reported by the fax machine that I used. A copy  
of the record of the fax transmission is attached.

17

18                  f.       By messenger:

19

20           I served the document(s) by placing them in an envelope or package addressed to  
the persons at the addresses listed below and providing them to a messenger for  
service.

21

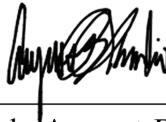
22           I declare under penalty of perjury that the foregoing is true and correct.

23           Dated: January 11, 2022.

24           By: /s/ Bart K. Larsen, Esq,

SHEA LARSEN  
1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134  
(702) 471-7432

# EXHIBIT 1





Honorable August B. Landis  
United States Bankruptcy Judge

Entered on Docket  
January 10, 2022

James Patrick Shea, Esq.

Nevada Bar No. 405

Bart K. Larsen, Esq.

Nevada Bar No. 8538

Kyle M. Wyant, Esq.

Nevada Bar No. 14652

**SHEA LARSEN**

1731 Village Center Circle, Suite 150

Las Vegas, Nevada 89134

Telephone: (702) 471-7432

Fax: (702) 926-9683

Email: jshea@shea.law

blarsen@shea.law

kwyant@shea.law

14 *Attorneys for HASelect-Medical Receivables*  
15 *Litigation Finance Fund International SP*

16 **UNITED STATES BANKRUPTCY COURT**

17 **DISTRICT OF NEVADA**

18 In re:

19 INFINITY CAPITAL MANAGEMENT,  
INC.

20 Debtor.

Case No. 21-14486-abl  
Chapter 7

21 **ORDER GRANTING EX PARTE MOTION FOR AN ORDER DIRECTING**  
22 **EXAMINATION PURSUANT TO FED. R. BANKR. P. 2004 OF**  
**KEVIN GRIMES**

23 This Court having reviewed the *Ex Parte Motion for Order Directing Examination Pursuant*  
24 *to Fed. R. Bankr. P. 2004 of Kevin Grimes* (the “Motion”) filed by HASelect-Medical Receivables  
25 Litigation Finance Fund International SP (“HASelect”) and for good cause appearing:

26 IT IS HEREBY ORDERED that the Motion is GRANTED.

27 IT IS FURTHER ORDERED that Kevin Grimes, shall appear for an examination under oath

1 before a certified court reporter at a time, place, and date to be mutually agreed upon by the parties,  
2 or if no such agreement is reached, upon no less than fourteen (14) calendar days' written notice by  
3 HASelect, as to any matter permitted by Fed. R. Bankr. P. 2004, including but not limited to the  
4 matters specifically enumerated in the Motion.

5 IT IS SO ORDERED.  
6

7 Submitted by:  
8

9 **SHEA LARSEN**

10 /s/ Bart K. Larsen, Esq.  
11 James Patrick Shea, Esq.  
Nevada Bar No. 405  
12 Bart K. Larsen, Esq.  
Nevada Bar No. 8538  
13 Kyle M. Wyant, Esq.  
Nevada Bar No. 14652  
14 1731 Village Center Circle, Suite 150  
Las Vegas, Nevada 89134

15 *Attorneys for HASelect-Medical Receivables  
Litigation Finance Fund International SP*  
16

1731 Village Center Circle, Suite 150  
18 Las Vegas, Nevada 89134  
19 (702) 471-7432  
20  
21  
22  
23  
24  
25  
26  
27  
28